

# **EXHIBIT 5**

**IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF MICHIGAN**

**ESTATE OF GEORGE  
BERNARD WORRELL, JR.**

**Plaintiff,**

**v.**

**THANG, INC., GEORGE  
CLINTON, SONY MUSIC  
ENTERTAINMENT, UNIVERSAL  
MUSIC GROUP, WARNER  
BROTHERS RECORDS, HDH  
RECORDS, WESTBOUND  
RECORDS AND SOUND  
EXCHANGE, INC.**

**Defendants,**

Case No. 4:22 cv 11009

Hon. F. Kay Behm

Hon. Mag. David R. Grand

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DANIEL D. QUICK (P48109)  
Dickinson Wright PLLC  
Attorneys for Plaintiff  
2600 W. Big Beaver Road, Suite 300  
Troy, MI 48084  
(248) 433-7200 // Fax (844) 670-6009  
dquick@dickinsonwright.com

JAMES P. ALLEN, Sr. (P52885)  
Allen Brothers, Attorneys and  
Counselors, PLLC  
Attorneys for Defendants Thang  
Inc. and George Clinton  
401 N. Main St.  
Royal Oak, MI 48067  
313-962--7777  
jamesallen@allenbrotherspllc.com

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**Expert Report of Dr. Ellen Exner**

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48. Worrell is credited with inventing the electronic “clap” track and using synthesizers to play bass lines. His conservatory training in European classical repertory, composition, and arranging allowed for the “elaborately layered horn and vocal lines” Vincent describes, as well as the successful, coherent synthesis of European styles with African grooves within a large ensemble. Worrell’s innate creativity paired with his highly skilled and trained musical mind were the glue that held P-Funk’s extraordinarily varied influences together and allowed them to become their own, unmistakable entity.

49. Clinton is quoted as having said, “We took our funk and rock and roll and put Bernie’s chops in it, and we had something nobody knew what the hell we were doing.” (Clinton Depo at 108: 21-24). Worrell’s technical and stylistic virtuosity were among the signature features that differentiated P-Funk from all of their peers. He was artistically essential to the group’s success.

50. George Clinton did not act alone and immeasurably benefited from being in Parliament-Funkadelic with Worrell.

#### **SUPPLEMENTATION:**

51. I reserve the right to use all materials considered in preparing this report, including without limitation the materials set forth in the foregoing sections at trial. Additional reports and depositions of experts and other witnesses may be conducted in this matter and I plan on reviewing their deposition transcripts when they become available and reserve the right to supplement or amend this report upon my review. I reserve the right to supplement or modify this report and the opinions expressed based upon additional facts, documents, or other materials that may be brought to my attention.

#### **FEES:**

52. My fee to draft this initial report is \$2500.00. My hourly rate for deposition and trial testimony is \$500.00 per hour plus travel costs.

#### **WORKS CONSULTED:**

Aaron, Charles and Mosi Reeves. “10 Essential Tracks from the P-Funk Keyboardist,” in *Rolling Stone*, 24 June 2016, <https://www.rollingstone.com/music/music-lists/bernie-worrell-10-essential-tracks-from-the-p-funk-keyboardist-25062/funkadelic-free-your-mind-and-your-ass-will-follow-1970-162689/>. Accessed 14 March 2019.